

**REMARKS****1. Present Status of Patent Application**

This is a full response to the outstanding final Office Action, mailed July 29, 2004. Reconsideration and allowance of the application and presently pending claims 1, 2, 21-27, 29, and 31-36 are respectfully requested.

**2. Response to Rejections of Claims 1, 2, 21, 22, 24, 26, 27, 29, and 31-33 Under 35 U.S.C. §102(b)**

Claims 1, 2, 21, 22, 24, 26, 27, 29, and 31-33 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by *Moline* (U.S. Patent No. 5,075,759). For a proper rejection of a claim under 35 U.S.C. Section 102(b), the cited reference must disclose all elements/features/steps of the claim. *See, e.g., E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 USPQ2d 1129 (Fed. Cir. 1988).

**a. Claim 1**

As provided in independent claim 1, Applicants claim:

1. A microelectronic device package comprising:
  - a die attach pad, said pad having a bottom surface;
  - a plurality of substantially flat electrical connectors formed about a perimeter of said die attach pad, wherein said connectors are configured to couple a device to a substrate;
  - a coupling of a plurality of wires from said device package to one of said connectors;*** and
  - an encapsulant surrounding a portion of said electrical connectors and a portion of said die attach pad, wherein said bottom surface of said die attach pad is substantially free of encapsulant.

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Moline* does not disclose, teach, or suggest anywhere in the specification or in the figures at least the above-highlighted feature of “a coupling of a plurality of wires from said device package to one of said connectors” as recited in claim 1.

*Moline* is apparently limited to an electronic module whose individual contact members provide contact points for individual wires. As expressly shown in the figures of *Moline*, respective bond wires 26 electrically connect individual transistor cells 22, 24 of die 20 to individual lead planes or to non-connector components 52, 62, 70, such as a MOSCAP, bridge, resistor, inductor, capacitor, etc. See, e.g., col. 4, lines 39-54; and figs. 1-8B. Therefore, *Moline* fails to disclose all the features of claim 1.

b. Claims 2, 21-22, 24-27, 29, and 31-33

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claims 2, 21-22, 24-29, and 31-33 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 21-22, 24-29, and 31-33 contain all the features and elements of independent claim 1.

3. Response to Rejections of Claims 23, 25, 34, 35, and 36 Under 35 U.S.C. §103(a)

Claims 23, 25, 34, and 36 have been rejected under 35 U.S.C. §103(a) as being purportedly unpatentable over *Moline*. In addition, claim 35 has been rejected under 35 U.S.C. §103(a) as being purportedly unpatentable over *Moline* in view of *Kinghorn*. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon prior art, the prior art must disclose, teach, or suggest, either implicitly, all elements/features/steps of the claim at issue. See, e.g., *In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claims 23, 25, 34, 35, and 36 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims 23, 25, 34, 35, and 36 contain all the features and elements of independent claim 1. Additionally and notwithstanding the foregoing reasons for allowability of claims 23, 25, 34, 35, and 36, the aforementioned claims recite further features (as is apparent by examination of the claim itself) that are patentably distinct from the prior art of record. Further, Applicants traverse the Office Action's allegation that:

[I]t would have been obvious to one having ordinary skill in the art at the time the invention was made to modify the wire of *Moline* by employing the diameter of 25

micron or to modify the frame of Moline by employing the thickness of 200 microns, since such a modification would have involved a mere change in the size of the wire or frame. A change in size is generally recognized as being within the level of ordinary skill in the art. *In re Rose*, 105 USPQ 237 (CCPA 1955).

With respect to the cited authority, *In re Rose*, that case was referring to the length of lumber strips for a lumber package. *In re Rose*, 105 USPQ 237 (CCPA 1955). In that case, the court did not feel that particular limitation was patentably significant for that particular technology. *Rose* at 240. That is not the case with the instant application.

Accordingly, the rejection of claims 23, 25, 34, 35, and 36 should be withdrawn.

### **CONCLUSION**

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1, 2, 21-27, 29, and 31-36 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,



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